



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

June 29, 2012

Sarah Samuelson, Tongass Minerals Group  
Ketchikan-Misty Fiords Ranger District  
Tongass National Forest  
Attn: Bell Island Geothermal Lease  
3031 Tongass Avenue  
Ketchikan, Alaska 99901

Re: EPA Region 10 comments on the Bell Island Geothermal Lease Draft Supplemental  
Environmental Impact Statement, EPA Project # 07-026-BLM.

Dear Ms. Samuelson:

We have reviewed the US Forest Service's Bell Island Geothermal Lease Draft Supplemental Environmental Impact Statement. Our review of the EIS was conducted in accordance with our responsibilities under National Environmental Policy Act and Section 309 of the Clean Air Act.

We recognize that the supplemental EIS is narrowly focused on compliance actions and key resource concerns not previously analyzed, specifically impacts to the North Cleveland Inventoried Roadless Area (IRA) 529 and to subsistence, both of which were not considered for these particular lease sales in the original EIS. In addition, the EIS identifies the limitation of the IRA on the proposed action's development, namely the prohibition of road construction. Because roads cannot be constructed, and aerial access is not practical, development of geothermal resources could only occur on private land outside the National Forest System. As such, impacts to Forest Service resources would be indirect and minimal. Based on this analysis, we have assigned a rating of LO (Lack of Objections). A description of our rating is enclosed.

We look forward to reviewing subsequent analyses by the Bureau of Land Management should developable resources be identified in the future. If so, the concerns we identified in our scoping comments on June 23, 2011 would remain, namely, potential impacts associated with wastewater discharges, hazardous wastes, and fill of waters of the U.S.

Again, we appreciate the opportunity to provide comments on this project. If you would like to discuss these comments, please contact me at (206) 553-1601 or by email at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Reichgott".

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.